

MEMO ENDORSED

July 27, 2018

VIA ECF

Honorable Richard M. Berman
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

United States v. Usher et al., No. 17-cr-19 (RMB)

Let's Keep omnibus moving +
opposing briefs to 25 pp,
double spaced--6th for the
Dofs + the Govt. Each Dof may
submit a 2 pp supplement to
~~omnibus moving + opposing briefs~~
~~addressing issues unique to them.~~
SO ORDERED:
Date: 7/30/18 *Richard M. Berman*
Richard M. Berman, U.S.D.J.

Dear Judge Berman:

The parties' motions in limine are due by August 1, 2018. The defendants write to request leave for the parties to submit briefs longer than those prescribed by Rule 2(C) of Your Honor's Individual Practices.

As the Court is aware, the indictment charges three defendants jointly. The defendants currently anticipate moving in limine on four discrete issues. The defendants understand that the government expects to move in limine on three additional issues.

For the Court's convenience, and in keeping with common practice before the Court, the defendants intend to compile their moving arguments in a single, omnibus brief. They intend to do the same in their papers opposing the government's motions in limine. The defendants will keep their presentations concise. However, we believe that a fair presentation of the issues will require up to 32 pages for each omnibus moving brief, and up to 32 pages for each omnibus opposition brief.

The government does not join this request, but asks (consistent with the defendants' request) that any relief be granted equally to all parties.

Respectfully Submitted:

Michael Kendall
Mark Gidley
Andrew Tombak
Counsel for Richard Usher

Heather Tewksbury
Anjan Sahni
Thomas Mueller
Counsel for Rohan Ramchandani

David Schertler
Lisa Manning
Counsel for Christopher Ashton

cc: Counsel for the Government

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